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RECENT CASES.

CIVIL RIGHTS—SALOONS—RHONE v. LOOMIS, 77 N. W. Rep. 31 (Minn.).—A statute provides that no person because of his race, color, or previous condition of servitude, shall be deprived of the full and equal enjoyment of privileges, accommodations, etc., furnished by hotels, theaters, restaurants, barber shops, or other places of public resort, refreshment, accommodation, etc. Under this statute the plaintiff, a colored man, sued the defendant, a saloon keeper, because latter refused to serve plaintiff with a glass of beer at his saloon, simply because of plaintiff's race and color. *Held* (two judges dissenting) that there could be no recovery, as a saloon does not come within the statute. The court held that as all legislation on the liquor traffic is restrictive and repressive, and should be restricted to the smallest practicable limits.

CONSTITUTIONAL LAW—CONSTRUCTION—BIBLE READING IN PUBLIC SCHOOLS—PFEIFFER v. BOARD OF EDUCATION OF CITY OF DETROIT, 77 N. W. Rep. 250 (Mich.).—The Board of Education provided for the use in schools, a book entitled, “Readings from the Bible,” containing extracts embodying general moral precepts. The teachers were not allowed to make comments, and any pupil could be excused from such readings on application of parents. *Held*, that use of such book in manner described is not in violation of constitutional provision, which says that no money shall be appropriated from the public treasury for the benefit of any religious sect or society, etc. Nor is it opposed to the provision which says that no law shall prevent any person from worshiping Almighty God according to the dictates of his own conscience. Moore, J., dissenting.

CONSTITUTIONAL LAW—POLICE POWER—TICKET BROKERAGE—PEOPLE EX REL. TYROLER v. WARDEN OF CITY PRISON OF CITY OF NEW YORK, 51 N. E. 1001 (N. Y.).—New York Laws of 1897, C. 506, Section 1, prohibiting the sale of passenger tickets by persons not the agents of the carrier, and Section 2, allowing the agents of one carrier to buy and sell tickets of other carriers, is unconstitutional. The statute does not prohibit the sale of tickets absolutely. “The buying and selling of passage tickets is condemned only where the seller has not authority from some one of the transportation companies to act as agent.” The state does not ascertain what men are fit to engage in this business by examination or other means. The selection is made wholly by the carriers. This is in contravention of Article 1, Section 6, of the New York Constitution, providing that no person shall be deprived of liberty without due process of law. It is not a valid police regulation of the business of ticket brokerage. Bartlett, Martin and Gray, J. J., dissented.

CRIMINAL LAW—EVIDENCE—CONFessions—DECLARATIONS AGAINST INTEREST—STATE v. WILLIS, 41 Atl. Rep. 820 (Ct.).—A detective, after the capture of a prisoner accused of murder, told him, “Now, Ben, if you tell the chief and myself the whole thing—how it was done—it will make it a good deal easier for you,” he superintendent adding, “It is right, it will make it go easier, if you tell the whole thing.” Afterwards, for another detective, he signed a confession to which was annexed the words: “I hereby make this statement unconditionally.” *Held*, such to be a voluntary confession.